

**PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA**

**Telecommunications Division  
Market Structure Branch**

**RESOLUTION T-16894  
November 19, 2004**

**R E S O L U T I O N**

Resolution T-16894. Family Service of Santa Barbara. Request for certification as the 2-1-1 service provider for Santa Barbara County.

By Letter to Executive Director filed on September 14, 2004.

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**Summary**

This resolution grants Family Service Agency of Santa Barbara County (herein referred to as FSA), the authority to use the 2-1-1 abbreviated dialing code to provide information and referral (I&R) services to all of Santa Barbara County. This authority is granted for an indefinite term, and is subject to review upon a letter to the Commission showing sufficient grounds to revise or rescind the term.

**Background**

2-1-1 is the national abbreviated dialing code designated by the Federal Communications Commission to be used to phone non-emergency community I&R providers. Upon dialing 2-1-1, a caller will be routed to a referral service and then to an agency that can provide information concerning social services such as housing assistance, programs to assist with utility bills, food assistance and other less urgent situations not currently addressed by either 911 or 311 services. On January 23, 2002, the California Public Utilities Commission (Commission) instituted Rulemaking (R.) 02-01-025 into the implementation of 2-1-1 dialing in the State of California. In Decision (D.) 03-02-029, the Commission adopted regulatory policies and procedures to implement 2-1-1 dialing.

Included among these policies were guidelines and procedures whereby the Commission can certify I&R providers as eligible to purchase network telephone service that will enable them to receive calls from those who dial 2-1-1. Most of the procedures for I&R providers to follow in requesting authority to use the 2-1-1 dialing code are contained in D.03-02-029's Ordering Paragraph 2, quoted below:

2. Information and Referral (I&R) providers seeking authority to provide 2-1-1 service or to establish Regional Technical Centers for routing 2-1-1 calls to I&R service providers in California shall submit a letter to the Executive Director of the Commission approximately nine months before they plan to commence service. The letter shall contain the information detailed in the Service Provider Application Package in Appendix A, shall include a service rollout plan, and shall demonstrate compliance with the guidelines contained in Appendix A to this decision, along with letters of endorsement from community groups as described in Appendix A. The I&R providers shall serve this application letter on the parties to this proceeding on the same day as its submission to the Commission. The Commission shall publish a notice of this letter in its Daily Calendar. We establish a milestone of six months from the initial filing of this application letter for action by the Commission via a resolution resolving any issues. This application letter should be served on the appropriate incumbent local exchange carriers and on all parties to this proceeding.

By Letter to the Executive Director received on September 14, 2004, Family Service Agency of Santa Barbara (FSA) filed with the Commission's Executive Director a complete copy of its application letter<sup>1</sup> requesting certification as the 2-1-1 service provider in Santa Barbara County, as well as a copy with information FSA considered confidential redacted. On the same date, FSA sent to Verizon California, Inc. as well as the service list for R.02-01-025 redacted copies of its application letter.

We remind local exchange carriers of D. 03-02-029, Ordering Paragraph 3, which states "Within four months of the filing of a letter by I&R providers or a regional technical center seeking to initiate 2-1-1 service, the incumbent local exchange carriers serving the territory over which the 2-1-1 service will be offered shall file advice letters to provide the 2-1-1 switch translation services required."<sup>2</sup> Ordering Paragraph 4 states "All other incumbent local carriers serving a territory over which the 2-1-1 service will be offered shall provide the needed switch translation service, but may either concur in the price terms offered by Pacific Bell Telephone Company (Pacific) or Verizon California, Inc. (Verizon) or submit their own cost support information. This filing shall follow that of Pacific or Verizon by no more than 30 days." Competitive local carriers must comply with Ordering Paragraph 7, which states in part, "Within one month of the filing of an advice letter by incumbent local exchange carriers to offer 2-1-1 switch translation services in a specific area, each competitive local carrier providing services in the affected areas shall submit an advice letter, under General Order 96-a, demonstrating

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<sup>1</sup> The terms "application letter" and "application" used herein mean the package of materials the prospective I&R provider files with the Commission by letter to the Executive Director, as specified in D.03-02-029, and are not a formal application to the Commission as described in the Commission's Rules of Practice and Procedure.

that it will offer 2-1-1 switch translation service at a reasonable rate to I&R providers on a timetable consistent with their rollout plans.”

We remind payphone service providers of the same decision’s Ordering Paragraph 6, stating in part “The providers of payphone services in an area in which 2-1-1 service will be offered shall end all non-conforming uses of 2-1-1 service within six months of their filing.” i.e., within six months of the filing of the application letter by the I&R provider.

### **Notice/Protests**

FSA states that it mailed a copy of its application letter to Verizon California, Inc. as well as to the service list for R.02-01-025, which includes the appropriate incumbent local exchange carriers. The Telecommunications Division (TD) published notice of FSA’s application letter in the Commission Daily Calendars on September 20, through September 30, 2004. Written comments on FSA’s application letter were received from California Alliance of Information and Referral Services, Inc. (CAIRS), supporting the request of FSA to use the 2-1-1 dialing code in Santa Barbara County.

### **Discussion**

The application prescribed by D.03-02-029 for potential I&R providers is divided into four major sections. The first section elicits information on the I&R provider’s organization, its structure, its background, and experience.

Family Service Agency of Santa Barbara (FSA) is a non-profit organization operating in Santa Barbara for 51 years. FSA was founded 105 years ago on July 31, 1899, and incorporated in 1908. The documents FSA included to support this categorization are its articles of incorporation, including amendments, and letters from the Internal Revenue Service. Its location is 123 West Gutierrez Street, Santa Barbara, CA 93101. The contact person is Grace McIntosh, Associate Director, (805) 965-1001.

FSA’s application states that it is an established entity providing comprehensive information and referral services in Santa Barbara County. FSA’s program includes a Resource and Referral: CRIS (Community Resources Information Service)/Helpline. CRIS/Helpline is a bilingual telephone hotline and information service available 24 hours a day, 7 days a week to address suicide and crisis prevention. Access to CRIS/Helpline information and referral service is also available to the public through FSA’s website: [www.fsacares.org](http://www.fsacares.org). Services are provided in English and Spanish. Interpreter support in more than 140 other languages will be available 24 hours a day with implementation of 2-1-1 service through a professional tele-interpreting language line service.

FSA's budget and financial statements indicate a stable and solvent financial position. It appears that FSA has appropriate budgetary planning procedures to support 2-1-1 service at current call volumes. FSA's Board of Directors also represents a wide cross-section of affiliations in Santa Barbara County, including healthcare interests.

The second section of the prescribed application sets forth the required service conditions that a 2-1-1 service provider must meet. Section 2 of FSA's application indicates that it does not and will not receive fees from referred organizations nor charge providers to be listed in its database. Furthermore, FSA provides its service at no charge to callers and there are no advertisements or commercial sponsorship messages on its lines. FSA states that it currently operates 24/7/365. Information and Referral services are provided live by staff and trained volunteers, and currently it has staff capacity to offer services in English and Spanish. Tele-interpreting services will be available to assist the public in 140 languages. FSA is in the process of purchasing upgraded TTY/TTD equipment. Staff is currently undergoing additional training with the Independent Living Center in Santa Barbara to handle calls from persons with disabilities.

In the third section of the prescribed application, the applicant must demonstrate its understanding of and agreement to adhere to the standards for delivery of I&R services established by the Alliance of Information and Referral Services (AIRS). FSA's application includes descriptions of its policies in the areas of call assessment and follow-up, confidentiality, database standards, disaster readiness, reports and measures, cooperative relationships, training, marketing, and program evaluation. These policies appear to be more than adequate to meet the standards established by AIRS.

In the fourth section of the prescribed application, the applicant demonstrates its level of community support by including up to 15 letters of endorsement from organizations and agencies that are stakeholders in the health and human services network in its community. FSA included in its application letters of endorsement from 15 different organizations and agencies. These endorsements demonstrate broad community support, including support from the following interests: medical, housing, domestic violence, substance abuse prevention, education and child services as well as from local government.

In processing this 2-1-1 application, the Telecommunications Division considered the input of the Santa Barbara County government because it oversees the operations of county operations of county hospitals, a county welfare department, and numerous other agencies and programs in the fields of health and human services, and is best equipped to evaluate whether an I&R provider is well suited to provide comprehensive I&R service in Santa Barbara. California's size and diversity, in geography, politics, and many other categories, argue against a statewide "one size fits-all" approach to

evaluating and choosing comprehensive I&R providers. County governments can best apply local standards and local knowledge to this difficult but important task. The First District Supervisor, Naomi Schwartz on behalf of Santa Barbara County Board of Supervisors sent a letter on September 28, 2004 endorsing FSA to serve as the 2-1-1 provider for Santa Barbara County residents and employees. The Commission values the input of the Santa Barbara County Board of Supervisors on this matter, and takes official notice of its action.

D.03-02-029 did not specifically address the length of time for which the Commission's grant of authority to use the 2-1-1 dialing code should be made. Utilities and other frequent participants in Commission proceedings generally know that most Commission decisions, resolutions, and actions can be later modified or rescinded if a showing of sufficient grounds to do so is made in a filing before the Commission. However, most I&R providers and county governments are not frequent participants in Commission proceedings, and may benefit from some clarification of this point. The grant of authority to use the 2-1-1 dialing code in a county or group of counties is for an indefinite term and may be revised or rescinded if a showing of sufficient grounds to do so is made to the Commission. For the reasons cited in the previous paragraph, the Commission should consider a resolution by the Santa Barbara County Board of Supervisors as a crucial part of any showing that the authority to use the 2-1-1 dialing code for comprehensive I&R service for Santa Barbara County should be rescinded, reassigned, or modified. A letter to the Commission's Executive Director could serve to initiate such a process. Any such process should provide notice to all affected parties and an opportunity to be heard.

The Telecommunications Division concludes that the application letter filed by FSA meets the requirements set forth in the Commission's order and recommends that the Commission approve this filing. Commission approval is based on the specifics of the application letter, and does not establish a precedent for the contents of future filings or for Commission approval of similar requests.

This is an uncontested matter in which the resolution grants the relief requested. Accordingly, pursuant to P.U.Code Section 311 (g) (2), the otherwise applicable 30-day period for public review and comment is being waived.

## **Findings**

1. Family Service Agency of Santa Barbara (FSA) filed its application letter for certification as the 2-1-1 service provider for Santa Barbara County with the Commission on September 14, 2004.
2. One written comment from CAIRS was filed in support of FSA's application.

3. The Commission should consider the judgment and expertise of county government for the selection of the county's comprehensive I&R provider.
4. The First District Supervisor of the Santa Barbara County Board of Supervisors sent a letter to the Commission on September 28, 2004, endorsing FSA to serve as the 2-1-1 provider for Santa Barbara County.
5. TD concludes that FSA's application meets the requirements established by D. 03-02-029 to use the 211 dialing code.

**THEREFORE, IT IS ORDERED that:**

1. Family Service Agency of Santa Barbara (FSA) is granted the authority to use the 2-1-1 abbreviated dialing code to provide information and referral (I&R) services to all of Santa Barbara County.
2. This authority is granted for an indefinite term, and is subject to review upon a letter to the Commission showing sufficient grounds to revise or rescind the term. Any process to contest, revise, or rescind this authority shall provide notice to all affected parties and an opportunity to be heard.
3. If FSA fails to implement 2-1-1 dialing within a year after the Commission's approval of FSA and the needed tariffs of the telecommunications service providers ordered in Ordering Paragraphs 3, 4, and 7 of D.03-02-029, then, barring further Commission action, the certification of FSA shall lapse so that another I&R provider may apply to offer service in a service territory containing Santa Barbara County.
4. FSA shall notify the Director of the Telecommunications Division in writing of the date 2-1-1 services is first rendered to the public, within five days after service begins.

This Resolution is effective today.

I hereby certify that the Public Utilities Commission at its regular meeting on November 19, 2004 adopted this Resolution. The following Commissioners approved it:

/s/ STEVE LARSON

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STEVE LARSON  
Executive Director

MICHAEL R. PEEVEY  
President

CARL W. WOOD

LORETTA M. LYNCH

GEOFFREY F. BROWN

SUSAN P. KENNEDY

Commissioners